IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

REBECCA BROWN and AUGUST TERRENCE ROLIN, on behalf of themselves and all others similarly situated,)) Civil Action No. 2:20-cv-64-LPL
Plaintiffs,))
v.) MOTION TO DISMISS
TRANSPORTATION SECURITY ADMINISTRATION, et al.,	
Defendants.)) _)

"STEVE" LAST NAME UNKNOWN'S MOTION TO DISMISS

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant "Steve" Last Name Unknown, sued in his personal capacity, respectfully moves the Court for an order dismissing Count V, the sole claim asserted against him. This Motion is based on the facts, law, and discussion contained in the accompanying Brief in Support, filed simultaneously herewith and incorporated herein by reference. A proposed order and certification of counsel are attached.

WHEREFORE, Defendant "Steve" Last Name Unknown respectfully requests that the Court issue an Order dismissing the sole claim asserted against him (Count V) with prejudice.

Respectfully submitted,

JOSEPH H. HUNT Assistant Attorney General Civil Division

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/s/ David Inkeles

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CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of May, 2020, a true and correct copy of "Steve" Last Name Unknown's Motion to Dismiss was served upon the attorney of record for each other party by means of the District Clerk's CM/ECF electronic filing system.

/s/ David Inkeles

DAVID W. INKELES

Trial Attorney, U.S. Department of Justice